

1 HON. JUDGE JAMAL N. WHITEHEAD
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6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

8 DIANE SIMKINS, decedent, by her
9 personal representative Kristi Simkins;
KRISTI SIMKINS and PATRIC ROGERS;
and CHRISTER PERSSON,

10 Plaintiffs,

11 v.

12 NEW YORK LIFE INSURANCE
13 COMPANY; and ILLUMIFIN
14 CORPORATION, a foreign profit
corporation,

15 Defendants.

16 No. 2:23-cv-00578-JNW

17 STIPULATED ORDER ON
18 DEFENDANT ILLUMIFIN
19 CORPORATION'S MOTION FOR
20 PROTECTIVE ORDER LIMITING
21 THE SCOPE OF 30(B)(6)
22 DEPOSITION

23 NOTE ON MOTION CALENDAR:
June 25, 2024

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25 COME NOW, the parties, Plaintiffs Diane Simkins, decedent, by her personal
representative, Kristi Simkins, Kristi Simkins, Patric Rogers, and Christer Persson (“Plaintiffs”),
and Defendant illumifin Corporation (“illumifin”) (together, the “Parties”), through their
undersigned attorneys, and hereby stipulate to Defendant’s illumifin Corporation’s Motion for
Protective Order Limiting the Scope of 30(b)(6) Deposition as follows:

26 The Plaintiffs will limit the following topics as indicated:
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31 STIPULATED ORDER ON DEFENDANT
32 ILLUMIFIN CORPORATION'S MOTION
33 FOR PROTECTIVE ORDER
34 (No. 2:23-cv-00578-JNW) - 1

35 **RUIZ & SMART LLP**
36 901 Fifth Ave., Ste. 820
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1	Topic 9	Plaintiffs will not inquire about specific education and training information for subject employees.
2	Topic 14	Plaintiffs withdraw.
3	Topic 16	Plaintiffs withdraw.
4	Topic 17	Plaintiffs will limit to January 1, 2016, to the present. illumifin has agreed to provide general information regarding the salaries and bonuses of these types of employees. The parties agree that illumifin will not be required to provide specific compensation information.
5	Topic 18	Plaintiffs withdraw.
6	Topic 21	illumifin will not produce documents on this topic. illumifin has agreed to designate a representatives or representatives to testify who has knowledge of illumifin's general compensation plans including bonuses, compensation, incentives, or other incentives given or paid to claims representatives, claims managers or their supervisors from January 1, 2016 to the present.
7	Topic 23	Plaintiffs will not inquire about contents of personnel files.
8	Topic 24	Plaintiffs will not inquire relating to disciplinary history or the contents of any personnel file.
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STIPULATED ORDER ON DEFENDANT
ILLUMIFIN CORPORATION'S MOTION
FOR PROTECTIVE ORDER
(No. 2:23-cv-00578-JNW) - 2

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1 DATED: June 20, 2024

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36 STIPULATED ORDER ON DEFENDANT
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39 (No. 2:23-cv-00578-JNW) - 3

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ORDER

IT IS SO ORDERED.

In addition, Defendant Illumifin's motion for protective order, Dkt. No. 99, is stricken as moot without prejudice.

Dated this 21st day of June, 2024.



Jamal N. Whitehead
United States District Judge

STIPULATED ORDER ON DEFENDANT
ILLUMIFIN CORPORATION'S MOTION
FOR PROTECTIVE ORDER
(No. 2:23-cv-00578-JNW) - 4

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